

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

IN RE:

YELLOW CORPORATION, et al,

Chapter 11

Case No. 2:23-11069-CTG

Debtor.

U.S. Holland LLC, 23-11079

Claim No. 15390

Yellow Corporation, 23-11069

Claim No. 15389

YRC, Inc., 23-11087

Claim No. 15391

(Jointly Administered)

Obj. Due: Jan. 15, 2024

Hearing Date: Jan. 22, 2024, at 2pm EST

CLAIMANT'S MOTION FOR RELIEF FROM STAY

NOW COMES, Kevin Cook, by and through counsel, and pursuant to 11 U.S.C. § 362(d)(1), respectfully requests this Court lift the automatic stay for Claimant's imminent Washtenaw County, Michigan personal injury action.

Claimant's claim arises out of an automobile accident in the State of Michigan in April 2023. A lawsuit has not yet been filed due to this bankruptcy filing. The involved vehicle was owned by YRC, Inc., and driven by Rickie Allen Oneil, believed to be an employee of YRC, Inc., U.S. Holland LLC, and/or Yellow Corporation. A copy of the relevant police report is attached as Exhibit 1.

YRC, Inc., U.S. Holland LLC, and Yellow Corporation are insured for its liability for the accident and damages to Claimant. Claimant forgoes any claim to YRC, Inc., U.S. Holland LLC, and/or Yellow Corporation's assets and limits his recovery to the insurance policy.

“The Bankruptcy Code provides that the bankruptcy court may grant relief from the automatic stay for cause.” *In re Martin*, 542 B.R. 199, 202 (B.A.P. 6th Cir. 2015) (citing 11 U.S.C. § 362(d)(1)). “The decision whether or not to lift the automatic stay resides within the sound discretion of the bankruptcy court.” *Id.*

The bankruptcy court “has no jurisdiction over proceedings that have no effect on the debtor or its estate.” *Landry v. Exxon Pipeline Co.*, 260 B.R. 769, 777 (Bankr. M.D. La. 2001) (citing *Celotex Corp v. Edwards*, 514 U.S. 300, 308 n. 6 (1995)).

It is established that “if a debtor does not have a direct interest in the proceeds of the insurance policy,” then the insurance proceeds are not a part of the debtor’s estate, and “do not fall within the scope of the automatic stay provision in 11 U.S.C. § 363(a)(3).” *In re Youngstown Osteopathic Hosp. Ass’n*, 271 B.R. 544, 548 (Bankr. N.D. Oh. 2002). “In other words, when the debtor has no legally cognizable claim to the insurance proceeds, those proceeds are not property of the estate.” *Landry*, 260 B.R. at 786.

In *Landry*, the court explained, “[i]n the liability insurance context the debtor has no cognizable claim to the proceeds paid by an insurer on account of a covered claim. The proceeds are paid to the victim of the insured’s wrongful act. The insured debtor cannot ask the insurance company to pay him, or determine on its own how the proceeds of the policy should be distributed, nor can any creditor of the insured seize the proceeds in satisfaction of a claim not falling within the terms of the insurance contract.” *Landry*, 260 B.R. at 786.

Here, the insurance proceeds from Debtors’ liability coverage are outside of the scope of the automatic stay because the Debtors have no direct interest in the proceeds.

Additionally, the law is settled that the filing of a bankruptcy petition does not eliminate the liability of debtor’s automobile insurer and dictates that Mr. Cook may proceed against Debtors

in litigation to pursue recovery from Debtors' insurers. For example, in the Sixth Circuit, "it is well settled" that neither an automatic stay nor a permanent discharge injunction prevents suit against the debtor "solely to determine liability in order to collect from the debtor's insurer." *In re Rodgers*, 266 B.R. 834 (Bankr. W.D. Tenn. 2001). See also *Mauriello v. Great American E and S Ins Co.*, 554 F. Appx. 382, 384 (6th Cir. 2014). *In re Morris*, 430 B.R. 824, 831 (Bankr. W.D. Tenn. 2010) ("[T]he clear majority of cases in both the Sixth Circuit and elsewhere have found that § 524(e) allows a creditor to proceed against the debtor as a nominal defendant in order to pursue recovery from a third party.").

"This approach is grounded in the rationale that it makes no sense to allow an insurer to escape coverage for injuries caused by its insured merely because the insured receives a bankruptcy discharge." *Mauriello*, 554 F. Appx. at 384. The Court recognized that parties "typically request relief from the automatic stay to the extent of available insurance and proceed against the debtor as a nominal defendant for the purpose of establishing the debtor's liability." *Id.*

Here, Debtors do not have an interest in the insurance proceeds from the automobile liability policy. Accordingly, the potential insurance proceeds from Debtors' automobile insurance policy are not part of the debtor's estate, and do not fall within the scope of the automatic stay. *Landry*, 260 B.R. at 777; *In re Youngstown*, 271 B.R. at 548. Therefore, this Court should grant Claimant's motion and lift the automatic stay as to his imminent lawsuit against Debtors.

WHEREFORE, Claimant, Kevin Cook, respectfully requests this Court grant this Motion for Relief from the Automatic Stay.

Respectfully Submitted,

/s/ Madeline M. Sinkovich

Madeline M. Sinkovich P-82846¹
MIKE MORSE LAW FIRM
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Southfield, Michigan 48075
Madeline.sinkovich@855mikewins.com
(248) 621-2245

Dated: January 4, 2024

¹ Claimant's counsel is a Michigan attorney prosecuting claim litigation pursuant to Local Rule 9010-1(e)(iii).

EXHIBIT 1

Authority: 1949 PA 300, Sec.257.622
 Compliance: Required MSP UD-10E
 Penalty: \$100 and/or 90 days (Rev 11/2020)

External # 0348459
 Crash ID 2862989

Page 01 of 02
 File Class 93001

STATE OF MICHIGAN TRAFFIC CRASH REPORT

ORI MI 4701200		Department Name MSP Brighton		Incident # 12305323		Reviewer ROBERT CARTER	
Crash Date 04/15/2023	Crash Time 10:00	No. of Units 03	Crash Type Rear End	Special Circumstances <input checked="" type="radio"/> None <input type="radio"/> Fleeing Police	<input type="radio"/> Hit and Run <input type="radio"/> Unknown	<input type="radio"/> School Bus <input type="radio"/> Animal	Special Checks <input type="radio"/> Fatal <input type="radio"/> Non-Traffic Area <input type="radio"/> ORV/Snowmobile
County 81 - Washtenaw	Traffic Control None	Relation to Roadway On the Road		Weather Cloudy		Area FRWY Curved Roadway	
City/Twp 19 - York Twp	Contributing Circumstances 1st Backup - Other Incident 2nd		Light Daylight	Road Surface Condition Dry	Total Lanes 02	Speed Limit 70	Posted Yes
Work Zone (if applicable) Type Workers Present Activity Location							

LOCATION	Prefix N	Primary Road Name US 23	Road Type	Suffix	Divided Roadway N
	Distance / Direction 855 Feet NW				
	Trafficway Divided Hwy with Barrier				
	Prefix	Intersecting Road Name CARPENTER	Road Type RD	Suffix	Divided Roadway

UNIT / DRIVER	Unit Number 01	Unit Known Yes	State MI	Driver License Number O540738044620	Date of Birth (Age) 08/08/1956 (66)	License Type <input checked="" type="radio"/> Operator <input type="radio"/> Chauffeur <input type="radio"/> Moped	Endorsements <input type="radio"/> Cycle <input type="radio"/> Farm <input type="radio"/> Recreation	Sex M	Race W	Total Occupants 01	Hazardous Action Unable to Stop
	Unit Type MV	Driver Information RICKIE ALEN ONEIL 28622 CUMBERLAND DR FARMINGTON HILLS, MI 48334 (248) 390-6656				Driver is Owner No	Injury O	Position Front - Left	Restraint Shoulder and Lap Belt		
	Driver Condition at Time of Crash 1st Appeared Normal 2nd				Driver Distracted By Not Distracted			Ejected	Trapped	Airbag Deployed Not Deployed	
	Hospital OTHER					Ambulance HURON VALLEY AMB INC					
	Alcohol Suspected No	Contributing Factor No	Alcohol Test Type <input type="radio"/> Breath <input type="radio"/> Blood <input type="radio"/> Urine <input type="radio"/> Field <input type="radio"/> PBT <input type="radio"/> Refused <input checked="" type="radio"/> Not Offered			Alcohol Test Results <input type="radio"/> Pending Test Results:		Interlock Device No			
	Drug Suspected No	Contributing Factor No	Drug Test Type <input type="radio"/> Blood <input type="radio"/> Urine <input type="radio"/> Field <input type="radio"/> Refused <input checked="" type="radio"/> Not Offered			Drug Test Results <input type="radio"/> Pending Test Results:		Citation Issued <input checked="" type="radio"/> Hazardous <input type="radio"/> Other FAILED TO STOP SAFE DISTANCE			
	Vehicle Registration 3252347	State IN	Vehicle Description 2023	Year 2023	Make VOLVO	Model	Color WHI				
	VIN 4V4W19EG9PN616928	Vehicle Type Truck / Bus		Special Vehicles Not Applicable		Private Trailer Type	Vehicle Defect				
	Automation System(s) in Vehicle No		Automation System Level in Vehicle No Automation			Automation System Level Engaged at Time of Crash No Automation					
	Insurance Company OLD REPUBLIC INS CO			Insurance Policy # MWML18562			Towed By SAKSTRUPS TOWING		Towed To		
Location of Greatest Damage 02	First Impact 02	Extent of Damage (Power Unit and/or Trailers) Disabling Damage		Vehicle Direction N	Vehicle Use Commercial (Business)		Action Prior Going Straight Ahead				
Sequence of Events First ● 17 - Motor Veh in Transport (● indicates MOST harmful event)											

PASSENGERS	Passenger Information				Date of Birth (Age)	Sex	Race	Position	Restraint
					Injury	Ejected	Trapped	Airbag Deployed	
	Hospital				Ambulance				
	Passenger Information				Date of Birth (Age)	Sex	Race	Position	Restraint
					Injury	Ejected	Trapped	Airbag Deployed	
	Hospital				Ambulance				

TRUCK / BUS	Carrier Information YRC INC 10990 ROE AVE OVERLAND PARK, KS 66216				USDOT 000000075806		MC	MPSC
	GVWR/GCWR <input type="radio"/> 10,000 lbs. or Less <input type="radio"/> 10,001 - 26,000 lbs. <input checked="" type="radio"/> Greater than 26,000 lbs.				Vehicle Configuration Tractor / Semi-Trailer	Cargo Body Type 1	Medical Card No	Hazardous Material <input type="radio"/> Placard <input type="radio"/> Cargo Spill
	Driver's CDL Type Group A				Endorsements <input type="radio"/> H <input type="radio"/> P <input type="radio"/> T <input type="radio"/> N <input type="radio"/> S <input type="radio"/> X	CDL Exempt <input type="radio"/> Farm <input type="radio"/> Other		

OWNERS	Owner Information YRC INC 10990 ROE AVE OVER LAND PARK, KS 66216				Owner Information			

Damaged Property	Public	Owner & Phone

UNIT / DRIVER	Unit Number	Unit Known	State	Driver License Number	Date of Birth (Age)	License Type	Endorsements	Sex	Race	Total Occupants	Hazardous Action	
	02	Yes	MI	C200465429746	09/27/1968 (54)	<input checked="" type="radio"/> Operator <input type="radio"/> Chauffeur <input type="radio"/> Moped	<input type="radio"/> Cycle <input type="radio"/> Farm <input type="radio"/> Recreation	M	W	01	None	
	Unit Type	Driver Information				Driver is Owner	Injury	Position	Restraint			
	MV	KEVIN JOHN COOK 4388 JACOB RD GRASS LAKE, MI 49240 (734) 759-7332				Yes	B	Front - Left	Shoulder and Lap Belt			
	Driver Condition at Time of Crash				Driver Distracted By			Ejected	Trapped	Airbag Deployed		
	1st Appeared Normal				2nd Not Distracted					Deployed - Combination		
	Hospital					Ambulance						
	NONE					NONE						
	Alcohol Suspected	Contributing Factor	Alcohol Test Type			Alcohol Test Results		Interlock Device				
	No	No	<input type="radio"/> Breath <input type="radio"/> Blood <input type="radio"/> Urine <input type="radio"/> Field <input type="radio"/> PBT <input type="radio"/> Refused <input checked="" type="radio"/> Not Offered			<input type="radio"/> Pending Test Results:		No				
Drug Suspected	Contributing Factor	Drug Test Type			Drug Test Results		Citation Issued					
No	No	<input type="radio"/> Blood <input type="radio"/> Urine <input type="radio"/> Field <input type="radio"/> Refused <input checked="" type="radio"/> Not Offered			<input type="radio"/> Pending Test Results:		<input type="radio"/> Hazardous <input type="radio"/> Other					
Vehicle Registration		State	Vehicle Description	Year	Make	Model		Color				
DDE7910		MI		2014	GMC	ACADIA		WHI				
VIN			Vehicle Type		Special Vehicles		Private Trailer Type		Vehicle Defect			
1GKKVTKD8EJ314402			Passenger Car, SUV, Van		Not Applicable							
Automation System(s) in Vehicle			Automation System Level in Vehicle				Automation System Level Engaged at Time of Crash					
No			No Automation				No Automation					
Insurance Company				Insurance Policy #		Towed By			Towed To			
AMICA MUTUAL				930221205T		SAKSTRUPS TOWING						
Location of Greatest Damage	First Impact	Extent of Damage (Power Unit and/or Trailers)			Vehicle Direction	Vehicle Use		Action Prior				
10	05	Disabling Damage			N	Private		Slowing/Stop on Roadway				
Sequence of Events		First		Second		Third		Fourth				
		<input checked="" type="radio"/> 17 - Motor Veh in Transport		<input checked="" type="radio"/> 17 - Motor Veh in Transport								
<input checked="" type="radio"/> indicates MOST harmful event												
PASSENGERS	Passenger Information				Date of Birth (Age)	Sex	Race	Position	Restraint			
					Injury	Ejected	Trapped	Airbag Deployed				
	Hospital				Ambulance							
TRUCK / BUS	Carrier Information				USDOT		MC	MPSC				
					Driver's CDL Type		Endorsements	CDL Exempt				
							<input type="radio"/> H <input type="radio"/> P <input type="radio"/> T <input type="radio"/> N <input type="radio"/> S <input type="radio"/> X	<input type="radio"/> Farm <input type="radio"/> Other				
	GVWR/GCWR		Vehicle Configuration			Cargo Body Type	Medical Card	Hazardous Material		ID #	Class #	
	<input type="radio"/> 10,000 lbs. or Less <input type="radio"/> 10,001 - 26,000 lbs. <input type="radio"/> Greater than 26,000 lbs.							<input type="radio"/> Placard <input type="radio"/> Cargo Spill				
OWNERS	Owner Information					Owner Information						
WITNESS	Witness Information					Witness Information						
Investigated at Scene	Reported Date (Time)	1st Investigator Name (Badge)			2nd Investigator Name (Badge)			Photos				
Yes	04/15/2023 (10:27)	CODY RAY WIGGINS (1200)						No				
Narrative					Diagram							
Unit 1 was unable to stop in a safe distance before striking Unit 2 which struck Unit 3. Unit 1 driver reported head, neck, and back pain.					<p>Diagram Drawn Not To Scale NB US 23 FWY near CARPENTER RD</p>							

Authority: 1949 PA 300, Sec.257-622
 Compliance: Required MSP UD-10E
 Penalty: \$100 and/or 90 days (Rev 11/2020)

External # 0348459
 Crash ID 2862989

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ORI MI 4701200		Department Name MSP Brighton		Incident # 12305323		Reviewer ROBERT CARTER	
Crash Date 04/15/2023	Crash Time 10:00	No. of Units 03	Crash Type Rear End	Special Circumstances <input checked="" type="radio"/> None <input type="radio"/> Fleeing Police	<input type="radio"/> Hit and Run <input type="radio"/> Unknown	<input type="radio"/> School Bus <input type="radio"/> Animal	Special Checks <input type="radio"/> Fatal <input type="radio"/> Non-Traffic Area <input type="radio"/> ORV/Snowmobile
County 81 - Washtenaw	Traffic Control None	Relation to Roadway On the Road		Weather Cloudy		Area FRWY Curved Roadway	
City/Twsp 19 - York Twp	Contributing Circumstances 1st Backup - Other Incident 2nd		Light Daylight	Road Surface Condition Dry	Total Lanes 02	Speed Limit 70	Posted Yes
Work Zone (if applicable) Type Workers Present Activity Location							

LOCATION	Prefix N	Primary Road Name US 23	Road Type	Suffix	Divided Roadway N
	Distance / Direction 855 Feet NW				
	Trafficway Divided Hwy with Barrier				
Prefix CARPENTER	Intersecting Road Name	Road Type RD	Suffix	Divided Roadway	

UNIT / DRIVER	Unit Number 03	Unit Known Yes	State MD	Driver License Number MD10272175921	Date of Birth (Age) 12/09/1989 (33)	License Type <input checked="" type="radio"/> Operator <input type="radio"/> Chauffeur <input type="radio"/> Moped	Endorsements <input type="radio"/> Cycle <input type="radio"/> Farm <input type="radio"/> Recreation	Sex M	Race W	Total Occupants 02	Hazardous Action None	
	Unit Type MV	Driver Information ROBERT LEE FOGLE 11802 BROWNSVILLE RD MONROVIA, MD 21770 (240) 367-7447				Driver is Owner Yes	Injury O	Position Front - Left	Restraint Shoulder and Lap Belt			
	Driver Condition at Time of Crash 1st Appeared Normal 2nd				Driver Distracted By Not Distracted		Ejected	Trapped	Airbag Deployed Not Deployed			
	Hospital NONE				Ambulance NONE							
	Alcohol Suspected No	Contributing Factor No	Alcohol Test Type <input type="radio"/> Breath <input type="radio"/> Blood <input type="radio"/> Urine <input type="radio"/> Field <input type="radio"/> PBT <input type="radio"/> Refused <input checked="" type="radio"/> Not Offered			Alcohol Test Results <input type="radio"/> Pending	Test Results:	Interlock Device No				
	Drug Suspected No	Contributing Factor No	Drug Test Type <input type="radio"/> Blood <input type="radio"/> Urine <input type="radio"/> Field <input type="radio"/> Refused <input checked="" type="radio"/> Not Offered			Drug Test Results <input type="radio"/> Pending	Test Results:	Citation Issued <input type="radio"/> Hazardous <input type="radio"/> Other				
	Vehicle Registration 6CA2755	State MD	Vehicle Description 2015	Year	Make FORD	Model F350	Color BLU					
	VIN 1FT8W3BT5FEB09849	Vehicle Type Pickup Truck	Special Vehicles Not Applicable	Private Trailer Type Farm Equipment	Vehicle Defect							
	Automation System(s) in Vehicle No	Automation System Level in Vehicle No Automation				Automation System Level Engaged at Time of Crash No Automation						
	Insurance Company TWIN CITY FIRE INS CO	Insurance Policy # 30PH211962722514				Towed By		Towed To				
Location of Greatest Damage 11	First Impact 06	Extent of Damage (Power Unit and/or Trailers) Minor Damage		Vehicle Direction N	Vehicle Use Commercial (Business)		Action Prior Slowing/Stop on Roadway					
Sequence of Events First ● 17 - Motor Veh in Transport (● indicates MOST harmful event)												

PASSENGERS	Passenger Information WALTER MARTIN GLADHILL 10530 RENNER RD UNION BRIDGE, MD 21791				Date of Birth (Age) 04/05/1963 (60)	Sex M	Race W	Position Front - Right	Restraint Shoulder and Lap Belt		
					Injury O	Ejected	Trapped	Airbag Deployed Not Deployed			
	Hospital NONE				Ambulance NONE						
	Passenger Information				Date of Birth (Age)	Sex	Race	Position	Restraint		
					Injury	Ejected	Trapped	Airbag Deployed			
Hospital				Ambulance							

TRUCK / BUS	Carrier Information				USDOT	MC	MPSC
	Driver's CDL Type				Endorsements <input type="radio"/> H <input type="radio"/> P <input type="radio"/> T <input type="radio"/> N <input type="radio"/> S <input type="radio"/> X	CDL Exempt <input type="radio"/> Farm <input type="radio"/> Other	
	GVWR/GCWR <input type="radio"/> 10,000 lbs. or Less <input type="radio"/> 10,001 - 26,000 lbs. <input type="radio"/> Greater than 26,000 lbs.	Vehicle Configuration		Cargo Body Type	Medical Card	Hazardous Material <input type="radio"/> Placard <input type="radio"/> Cargo Spill	ID #

OWNERS	Owner Information		Owner Information	

Damaged Property	Public	Owner & Phone

UNIT / DRIVER	Unit Number	Unit Known	State	Driver License Number	Date of Birth (Age)	License Type <input type="radio"/> Operator <input type="radio"/> Chauffeur <input type="radio"/> Moped	Endorsements <input type="radio"/> Cycle <input type="radio"/> Farm <input type="radio"/> Recreation	Sex	Race	Total Occupants	Hazardous Action
	Unit Type	Driver Information				Driver is Owner	Injury	Position		Restraint	
	Driver Condition at Time of Crash 1st 2nd				Driver Distracted By		Ejected	Trapped	Airbag Deployed		
	Hospital					Ambulance					
	Alcohol Suspected	Contributing Factor	Alcohol Test Type <input type="radio"/> Breath <input type="radio"/> Blood <input type="radio"/> Urine <input type="radio"/> Field <input type="radio"/> PBT <input type="radio"/> Refused <input type="radio"/> Not Offered			Alcohol Test Results <input type="radio"/> Pending Test Results:		Interlock Device			
	Drug Suspected	Contributing Factor	Drug Test Type <input type="radio"/> Blood <input type="radio"/> Urine <input type="radio"/> Field <input type="radio"/> Refused <input type="radio"/> Not Offered			Drug Test Results <input type="radio"/> Pending Test Results:		Citation Issued <input type="radio"/> Hazardous <input type="radio"/> Other			
	Vehicle Registration	State	Vehicle Description	Year	Make	Model	Color				
	VIN		Vehicle Type		Special Vehicles		Private Trailer Type		Vehicle Defect		
	Automation System(s) in Vehicle		Automation System Level in Vehicle				Automation System Level Engaged at Time of Crash				
	Insurance Company			Insurance Policy #			Towed By			Towed To	
Location of Greatest Damage		First Impact	Extent of Damage (Power Unit and/or Trailers)		Vehicle Direction	Vehicle Use			Action Prior		
Sequence of Events		First	Second		Third			Fourth			
(● indicates MOST harmful event)											
PASSENGERS	Passenger Information				Date of Birth (Age)	Sex	Race	Position		Restraint	
					Injury	Ejected	Trapped	Airbag Deployed			
	Hospital					Ambulance					
	Passenger Information				Date of Birth (Age)	Sex	Race	Position		Restraint	
					Injury	Ejected	Trapped	Airbag Deployed			
	Hospital					Ambulance					
TRUCK / BUS	Carrier Information					USDOT		MC	MPSC		
						Driver's CDL Type		Endorsements <input type="radio"/> H <input type="radio"/> P <input type="radio"/> T <input type="radio"/> N <input type="radio"/> S <input type="radio"/> X	CDL Exempt <input type="radio"/> Farm <input type="radio"/> Other		
	GVWR/GCWR <input type="radio"/> 10,000 lbs. or Less <input type="radio"/> 10,001 - 26,000 lbs. <input type="radio"/> Greater than 26,000 lbs.		Vehicle Configuration			Cargo Body Type	Medical Card	Hazardous Material <input type="radio"/> Placard <input type="radio"/> Cargo Spill		ID #	Class #
OWNERS	Owner Information					Owner Information					
WITNESS	Witness Information					Witness Information					
Investigated at Scene		Reported Date (Time)		1st Investigator Name (Badge)		2nd Investigator Name (Badge)			Photos		
Narrative						Diagram					

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

IN RE:

YELLOW CORPORATION, et al,

Chapter 11
Case No. 2:23-11069-CTG

Debtor.

U.S. Holland LLC, 23-11079
Claim No. 15390
Yellow Corporation, 23-11069
Claim No. 15389
YRC, Inc., 23-11087
Claim No. 15391

(Jointly Administered)

Obj. Due: Jan. 15, 2024

Hearing Date: Jan. 22, 2024, at 2pm EST

NOTICE OF MOTION

PLEASE TAKE NOTICE that on January 4, 2024, Kevin Cook (“Claimant”) filed *Claimant’s Motion for Relief from Stay* (the “Motion”) in the United States Bankruptcy Court for the District of Delaware seeking relief from the automatic stay.

PLEASE TAKE FURTHER NOTICE that pursuant to Rule 9006-1(c)(ii) any objections to the Motion must be filed on or before January 15, 2024, with the United States Bankruptcy Court for the District of Delaware, 3rd Floor, 824 Market Street, Wilmington Delaware 19801. At the same time, you must serve a copy of any objection to the Motion for Relief on Movant’s undersigned counsel on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE that a hearing will be held on **January 22, 2024 at 2:00 p.m. (ET)** before Craig T. Goldblatt in the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 3rd Floor, Courtroom 7, Wilmington, Delaware 19801, if an objection is filed.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Date: January 4, 2024

/s/ Madeline M. Sinkovich

Madeline M. Sinkovich P-82846¹
24901 Northwestern Highway, Suite 700
Southfield, Michigan 48075
(248) 621-2245
Madeline.sinkovich@855mikewins.com

¹ Claimant's counsel is a Michigan attorney prosecuting claim litigation pursuant to Local Rule 9010-1(e)(iii).

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

IN RE:

YELLOW CORPORATION, et al,

Chapter 11

Case No. 2:23-11069-CTG

Debtor.

U.S. Holland LLC, 23-11079

Claim No. 15390

Yellow Corporation, 23-11069

Claim No. 15389

YRC, Inc., 23-11087

Claim No. 15391

(Jointly Administered)

ORDER GRANTING MOTION FOR RELIEF FROM AUTOMATIC STAY

This matter having come before the Court on Claimant Kevin Cook's Motion for Relief from the Automatic Stay, the Court having considered the motion, and having found cause:

IT IS ORDERED that the motion is granted.

Hon. Craig T. Goldblatt

Dated: _____

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

IN RE:

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Chapter 11

Case No. 2:23-11069-CTG

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U.S. Holland LLC, 23-11079

Claim No. 15390

Yellow Corporation, 23-11069

Claim No. 15389

YRC, Inc., 23-11087

Claim No. 15391

(Jointly Administered)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 4th day of January 2024, I served the following paper: “Claimant’s Motion for Relief From Stay” with attachments to all parties of record via CM/ECF filing.

Date: January 4, 2024

/s/ Madeline M. Sinkovich

Madeline M. Sinkovich P-82846¹

24901 Northwestern Highway, Suite 700

Southfield, Michigan 48075

(248) 621-2245

Madeline.sinkovich@855mikewins.com

¹ Claimant’s counsel is a Michigan attorney prosecuting claim litigation pursuant to Local Rule 9010-1(e)(iii).